

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<b>Edward “Coach” Weinhaus,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:24-cv-03061</b>
	)	
<b>Regina A. Scannicchio</b>	)	
<b>and Illinois Judges Association,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO DISMISS PLAINTIFF’S COMPLAINT**  
**PURSUANT TO FED.R.CIV.P. 12(b)(1) and 12(b)(6)**  
**BY DEFENDANT ILLINOIS JUDGES ASSOCIATION**

NOW COMES the Defendant, Illinois Judges Association, by and through its attorneys, Progar Law Group LLC, and pursuant to Fed. R. Civ. Proc. 12(b)(1) and 12(b)(6), respectfully moves this Court to dismiss Plaintiff’s Complaint (ECF No. 1) because the Court lacks subject-matter jurisdiction under the *Rooker-Feldman* doctrine and the domestic relations exception, and the Plaintiff also fails to state a claim for which relief can be granted against the Defendant, Illinois Judges Association. Further, the Plaintiff’s claims should be dismissed based upon absolute, qualified and Eleventh Amendment judicial immunities.

The Defendant, Illinois Judges Association, is contemporaneously filing a Memorandum of Law in Support of this Motion to Dismiss.

Additionally, pursuant to Fed. R. Civ. P. 12(g)(1), the Defendant, Illinois Judges Association, seeks to join in and to incorporate any Motion to Dismiss and supporting Memorandum of Law filed by the Defendant, Regina A. Scannicchio, in this matter.

Respectfully Submitted,

ILLINOIS JUDGES ASSOCIATION

By: /s/ Joseph Pierotti, Esq.

Joseph Pierotti, Esq.

One of its Attorneys

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**CERTIFICATE OF SERVICE**

I, Joseph Pierotti, certify that on June 25, 2024, a true and correct copy of the foregoing was served and filed using the Court's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon all counsel of record.

/s/ Joseph Pierotti, Esq.  
Joseph Pierotti, Esq.